

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**GINGER DAYTON, an individual;**

**Plaintiffs,**

**vs.**

**STEVEN CHAD TAGGART, et al.;**

**Defendants.**

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**Civil Action No.:  
3:07CV599-MEF**

**PLAINTIFF'S VOIR DIRE QUESTIONS**

**COMES NOW** the Plaintiff, through counsel, and submits the following Voir Dire questions:

1. Do any of you have any legal training, including training as an attorney, paralegal, attorney, law student, legal assistant, investigator and/or law clerk? If so, please describe.

Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

2. Do any of you have any medical training, including training as a physician, nurse, chiropractor, nursing assistant or physical therapist? If so, please describe.

Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

3. Do any of you have any experience or training in the field of adjusting and or evaluating liability insurance claims, including property damage claims and/or personal injury claims? If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

4. Have any of you ever been in automobile accident where a commercial tractor

trailer was involved? Did you receive any injuries as a result of that accident? If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

5. Do any of you have any training as a tractor trailer (18 wheeler) truck driver? If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

6. Do any of you have a commercial drivers license? If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

7. Have any of you ever suffered from a neck or lower back injury or condition? If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

8. Have any of you ever received any type of worker's compensation benefits as a result of an on the job injury? If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

9. Do any of you have any affiliation whatsoever, through family, work or otherwise, with the Defendant J.B. Hunt and/or Steven Taggart? If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

10. The following people may testify in this case. Do any of you know or are you familiar with any of these people?

- Annie Kimber
- John W. McKinney
- Jane Logan
- Dr. David Herrick
- Dr. Michael Davis

- Sargent M. Campbell

Do any of you know or have you ever been represented by the following attorneys:

**Firm - Huie, Fernambucq & Stewart**

- Jeffery C. Ash
- S.A. Bradley Baker, III
- Thomas E. Bazemoore
- Anna Katherine Graves Bowman
- Jimmy Brady
- Gerald C. Brooks, Jr.
- David L. Brown
- H. Lanier Brown
- Stanley A. Cash
- John S. Civils, Jr.
- Charles H. Clark, Jr.
- Philip R. Collins
- Jacob W. Crawford
- Lauren E. Davis
- M. Jeremy Dotson
- Joseph Robert Duncan, Jr.
- David Michael Fleming
- Charles Jackson Fleming, Jr.
- M. Keith Gann
- William G. Gantt
- Robert M. Girardau
- Jane Hall
- John D. Herndon
- Douglas R. Kendrick
- Jason M. Kirschberg
- Frank E. Lankford, Jr.
- H. Cannon Lawley
- James Reed Lawrence, III
- Paul F. Malek
- Eugene D. Martenson
- T. Kelly May
- Stewart W. McCloud
- Brad J. McGiboney
- Lucas C. Montgomery
- Bryan Paul
- Michelle K. Pieroni
- Walter J. Price, III
- Jennifer Reid
- Christopher S. Rodgers
- Gregory L. Schuck

- Michael T. Scivley
- Jennifer Devereaux Segers
- James R. Shaw
- John Isaac Southerland
- R. Gordon Sproule, Jr.
- J. Patrick Strubel
- Jay Allen Sydnor
- D. Alan Thomas
- Martha Leach Thompson

**Firm- King, Horsley & Lyons**

- Richard F. Horsley
- Larry T. King
- Champ Lyons, III
- Lindsey O'Dell

If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

11. Do any of you feel that an automobile accident that involves relatively minor visible damage to the automobiles automatically means that the drivers' injuries must also be relatively minor. If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

12. Do any of you serve on any committees, boards, or any other organization that studies, evaluates and/or provides consultation with regard to the legal system in the state of Alabama or the legal system within the United States. These committees include AVALA, The Business Counsel of Alabama, CALA, and/or any other group or committee that monitors or reviews jury verdicts. If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

13. The Plaintiff in this case, Ginger Dayton, has the burden of proof, meaning that she is required to "reasonably satisfy" you as to the accuracy of her claims in order for her to prevail. The standard of proof in a criminal case is "beyond a reasonable doubt". Does anyone

believe for any reason that Ms. Dayton is required to provide prove, beyond a reasonable doubt, as to the accuracy of her claims. If so, please describe. Would this affect your ability to be fair, impartial and completely neutral in making a decision in this case?

Respectfully submitted,

/s/ Richard F. Horsley  
**Richard F. Horsley**  
**Attorney for Plaintiff**

**OF COUNSEL:**

**Richard F. Horsley HOR032**  
**KING, HORSLEY & LYONS**  
**1 Metroplex Drive, Suite 280**  
**Birmingham, Alabama 35209**  
**(205) 871-1310**  
**Email: [rfhala@cs.com](mailto:rfhala@cs.com)**

**CERTIFICATE OF SERVICE**

\_\_\_\_\_ I hereby certify that I have served a copy of the above and foregoing Voir Dire Questions on all counsel of records listed below by placing a copy of same in the United States Mail, first class, postage pre-paid on this the 28<sup>th</sup> day July, 2008.

/s/ Richard F. Horsley  
**OF COUNSEL**

**Christopher Rogers**  
**Huie, Fernambucq & Stewart**  
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**Birmingham, Alabama 35223-2484**